

The Honorable John H. Chun

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO. 2:25-cv-00602-JHC

DECLARATION OF
ALEJANDRO SANCHEZ

I, ALEJANDRO SANCHEZ, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

2. I am the Deputy Director of the Washington State Department of Licensing (the Department) and have been in the position since December 2021. I have been employed by the state of Washington since December 2012, having served in various capacities, including Vice Chair of the Board of Tax Appeals and Special Assistant to Governor Jay Inslee.

3. The Department is responsible for administering the laws related to licensing and regulating drivers, vehicles, professions, and businesses; providing identification documents; collecting the state's fuel tax; and carrying out all other duties directed by law.

1 4. Among its many services, the Department offers driver licenses and identification
2 cards in two general forms, standard and enhanced.

3 **Enhanced Driver Licenses and Identification Cards**

4 5. The Department developed its Enhanced Driver License (EDL) and Enhanced
5 Identification Card (EID) programs with U.S. Customs and Border Protection in accordance with
6 the Western Hemisphere Travel Initiative.

7 6. Per the terms of the travel initiative, only U.S. citizens are eligible to obtain EDLs
8 and EIDs.

9 7. EDLs and EIDs are denoted with an American flag on the right side of the
10 cardholder's photograph and "Enhanced Driver License" along the top right of the card. Standard
11 driver licenses and identification cards read "Federal Limits Apply" along the top right of the
12 card and do not carry an American flag.

13 8. Applicants for an EDL or EID must provide proof of U.S. citizenship, proof of
14 identity, proof of Washington residence, and a Social Security Number.

15 9. Applicants for an EDL or EID must pay an additional \$7 per year of the renewal
16 timeframe. Applicants can choose between a six- or eight-year renewal cycle, thereby increasing
17 the cost of an EDL or EID by \$42 to \$56 over the standard document.

18 10. Applicants for an EDL or EID must also ensure that their current name matches
19 U.S. citizenship or identity documents. Those unable to do so, including, e.g., married
20 individuals, divorced individuals, and individuals who have adopted the name of a close relative,
21 must provide additional evidence substantiating their name change.

22 11. Substantiating a name change can be a cumbersome process, requiring the
23 applicant to search through records from courts and birth certificate-issuing departments. In
24 some cases, records are several decades old, only available in physical media, and located in
25 distant jurisdictions, thereby affecting the searchability, accessibility, and quality of the
26

documentation. Additional compounding factors include name changes made outside of the judicial process and multiple name changes throughout the applicant's lifetime.

Compliance with the REAL ID Act of 2005

12. The Department maintains compliance with the federal REAL ID Act of 2005 solely through its EDL and EID programs.

13. In 2017, the Department applied to the Department of Homeland Security (DHS) seeking authorization to use EDLs and EIDs as Washington's REAL ID-compliant documents.

14. DHS fully certified the Department-issued REAL ID-compliant documents on September 28, 2018, and provided recertification on December 16, 2024. In both cases, certification followed a lengthy assessment of the Department's adherence to the requirements outlined in 6 C.F.R. Part 37.

15. Specific requirements include, but are not limited to, verifying lawful status through the U.S. Citizenship and Immigration Services online platform, SAVE, and verifying Social Security Numbers with the Social Security Administration.

Washington Voter Registration

16. The Department refers certain individuals to Washington's Secretary of State for voter registration based on the following statutory criteria:

- (a) Any individual issued a new or renewed EDL or EID;¹ or
- (b) Any individual who answers in the affirmative to the questions "do you want to register or sign up to vote or update your voter registration?" and "are you a United States citizen?"²

For any applicant providing identity documents that demonstrate they are not a U.S. citizen, the Department will not ask the second set of questions, and the Department will not refer the individual to the Washington Secretary of State for voter registration.

¹ RCW 46.20.156.

² RCW 46.20.155(1).

17. Customers who state they are U.S. citizens and wish to register to vote are asked to read and sign the voter oath, which is available in 23 languages. The voter oath lists qualifications to vote, including U.S. citizenship.

Executive Order 14248

18. I have read and am familiar with federal and state laws related to elections, including the provisions of the National Voter Registration Act and the Help America Vote Act.

19. I have read Executive Order No. 14248 and am familiar with its contents. In particular, I have reviewed Sections 2(a)(i)(B), 2(a)(ii), and 2(b) aimed at state-level document issuances.

20. I understand that the executive order requires that state and local election officials record on the voter registration form information about the document a voter would use to prove their citizenship.

21. I understand that the executive order limits “documentary proof of citizenship” to U.S. passports; REAL ID Act-compliant identification documents that indicate U.S. citizenship; military identification cards that indicate U.S. citizenship; and valid federal or state government-issued photo identification that either indicates U.S. citizenship or is accompanied by proof of U.S. citizenship.

22. As of May 5, 2025, the Department had issued 1,962,723 EDLs and EIDs, representing approximately 29 percent of people who have a Department-issued identification card.

23. According to an estimate the Department prepared in 2023, approximately 3.3 million Washington residents have U.S. passports.

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1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this 20th day of May 2025.
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6 ALEJANDRO SANCHEZ
7 Deputy Director
8 Department of Licensing
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